

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

IN RE: REALPAGE, INC., RENTAL
SOFTWARE ANTITRUST LITIGATION
(NO. II)

Case No. 3:23-md-03071
MDL No. 3071

Chief Judge Waverly D. Crenshaw, Jr.

This Document Relates to:
3:23-cv-00742
3:23-cv-00979

**DEFENDANT CH REAL ESTATE SERVICES, LLC'S ANSWER AND DEFENSES TO
PLAINTIFFS' SECOND AMENDED CONSOLIDATED CLASS ACTION COMPLAINT**

CH Real Estate Services, LLC ("CH Real Estate") submits its answer and affirmative defenses to Plaintiffs' Second Amended Consolidated Class Action Complaint ("Complaint"), filed on September 7, 2023, as follows. CH Real Estate denies each and every allegation in the Complaint except as expressly admitted below:

In response to Plaintiffs' opening, unnumbered Paragraph, CH Real Estate admits that Plaintiffs purport to bring this action under federal antitrust laws and state laws on behalf of themselves and the proposed class, but denies that Plaintiffs are entitled to any of the requested relief. CH Real Estate denies the conspiracy alleged and denies the remaining allegations in the opening unnumbered Paragraph.

With respect to the numbered paragraphs in Plaintiffs' Complaint, CH Real Estate responds as follows:

I. INTRODUCTION¹

1. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 1 and Footnote 1 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 1 and Footnote 1 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 1 and Footnote 1 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 1 and Footnote 1 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

2. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 2 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. To the extent that the allegation in Paragraph 2 purport to relate to CH Real Estate, CH Real Estate admits only that it owned and/or managed multifamily residential properties during the alleged Class Period and that certain multifamily residential properties CH Real Estate owned and/or managed during the alleged Class Period used RealPage's RMS for at least part of the alleged Class Period,

¹ CH Real Estate notes that this, and any other header in the Complaint is not a factual statement to which any response is required. To the extent a response is required, CH Real Estate denies any allegations contained in Plaintiffs' headers.

but denies any characterization of CH Real Estate or CH Real Estate's use of RealPage's RMS. CH Real Estate denies the remaining allegations in Paragraph 2 and Footnote 2.

3. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 3 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 3 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. To the extent that the allegations in Paragraph 3 relate to CH Real Estate, CH Real Estate admits only that it owned and/or managed multifamily residential properties during the alleged Class Period and that certain multifamily residential properties CH Real Estate owned and/or managed during the alleged Class Period used RealPage's RMS for at least part of the alleged Class Period, but denies any characterization of CH Real Estate's use of RealPage's RMS. CH Real Estate denies the remaining allegations in Paragraph 3.

4. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 4 and Footnote 3 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 4 and Footnote 3 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 4 and Footnote 3 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 4 and Footnote 3 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

5. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 5 and Footnote 4 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 5 and Footnote 4 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 5 and Footnote 4 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 5 and Footnote 4 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

6. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 6 and Footnote 5 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 6 and Footnote 5 that relate to other Defendants and/or third parties to this action, and on this basis denies these allegations. To the extent that the allegations in Paragraph 6 and Footnote 5 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

7. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 7 and Footnotes 6-9 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 7 and Footnotes 6-9 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is

inconsistent therewith. To the extent that the allegations in Paragraph 7 and Footnotes 6-9 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 7 and Footnotes 6-9 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

8. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 8 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 8 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 8 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 8 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

II. BACKGROUND

9. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 9 and Footnotes 10-11 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 9 and Footnotes 10-11 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 9 and Footnotes 10-11 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these

allegations. To the extent that the allegations in Paragraph 9 and Footnotes 10-11 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

10. : CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 10 and Footnote 12 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 10 and Footnote 12 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 10 and Footnote 12 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 10 and Footnote 12 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

11. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 11 and Footnote 13 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 11 and Footnote 13 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 11 and Footnote 13 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 11 and Footnote 13 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

12. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 12 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 12 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 12 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

13. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 13 and Footnote 14 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 13 and Footnote 14 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 13 and Footnote 14 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 13 and Footnote 14 purport to relate to CH Real Estate, CH Real Estate admits only that RealPage collected information from CH Real Estate, and that CH Real Estate received daily pricing recommendations from RealPage, but denies any characterization of the information collected from CH Real Estate or the daily pricing recommendations received from RealPage. CH Real Estate denies the remaining allegations in Paragraph 13 and Footnote 14.

14. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 14 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 14 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 14 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 14 purport to relate to CH Real Estate, CH Real Estate admits only that it paid a fee to RealPage for its services, but denies any characterizations of any such fee. CH Real Estate denies the remaining allegations in Paragraph 14.

15. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 15 and Footnotes 15-16 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 15 and Footnotes 15-16 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 15 and Footnotes 15-16 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 15 and Footnotes 15-16 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

16. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 16 and Footnote 17 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which

no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 16 and Footnote 17 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 16 and Footnote 17 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 16 and Footnote 17 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

17. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 17 and Footnotes 17-21 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 17 and Footnotes 17-21 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 17 and Footnotes 17-21 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 17 and Footnotes 17-21.

18. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 18 and Footnote 22 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 18 and Footnotes 23-25 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks

knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 18 and Footnote 22 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

19. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 19 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 19 and Footnote 26 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 19 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

20. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 20 and Footnotes 27-28 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 20 and Footnote 28 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 20 and Footnotes 27-28 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 20 and Footnote 27-28 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

21. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 21 and Figure 1 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 21 and Figure 1 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 21 and Figure 1 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 21 and Figure 1 purport to relate to CH Real Estate, CH Real Estate admits that Plaintiffs purport to depict certain data in Figure 1. CH Real Estate denies the remaining allegation in Paragraph 21 and Figure 1.

22. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 22 and Figure 2 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 22 and Figure 2 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 22 and Figure 2 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 22 and Figure 2 purport to relate to CH Real Estate, CH Real Estate admits that Plaintiffs purport to depict certain data in Figure 2. CH Real Estate denies the remaining allegation in Paragraph 22 and Figure 2.

23. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 23 and Footnote 31 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 23 and Footnote 31 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 23 and Footnotes 31-32 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 23 and Footnote 31 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

24. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 24 and Footnotes 33-37 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 24 and Footnotes 33-37 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 24 and Footnotes 33-37 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 24 and Footnotes 33-37 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

25. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 25 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response

is required. To the extent a response is required, and to the extent that the allegations in Paragraph 25 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 25 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

26. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 26 and Footnotes 38-39 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 26 and Footnotes 38-39 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 26 and Footnotes 38-39 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 26 and Footnotes 38-39 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

27. Paragraph 27 and Footnotes 40-41 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 27 and Footnotes 40-41 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 27 and Footnotes 40-41 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their

truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 27 and Footnotes 40-41.

28. Paragraph 28 and Footnote 42 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 28 and Footnote 42 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 28 and Footnote 42 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 28 and Footnote 42.

29. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 29 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 29 and Footnotes 43-44 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 29 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

30. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 30 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 30 that relate to other

Defendants and/or third parties to this action, and on this basis denies these allegations. To the extent that the allegations in Paragraph 30 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

31. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 31 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 31 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 31 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

32. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 32 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 32 that relate to other Defendants and/or third parties to this action, and on this basis denies these allegations. To the extent that the allegations in Paragraph 32 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

33. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 33 and Footnotes 45-46 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 33 and Footnotes 45-46 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or

description that is inconsistent therewith. To the extent that the allegations in Paragraph 33 and Footnotes 45-46 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 33 and Footnotes 45-46 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

34. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 34 and Figures 3-4 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 34 and Figures 3-4 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. Footnote 47 contains Plaintiffs' explanation of a defined term, to which no response is required. To the extent that the allegations in Paragraph 34 and Figures 3-4 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 34 and Figures 3-4 purport to relate to CH Real Estate, CH Real Estate admits that Plaintiffs purport to depict certain data in Figures 3-4. CH Real Estate denies the remaining allegation in Paragraph 34 and Figures 4-4.

35. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 35 and Footnotes 48-49 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 35 and Footnotes 48-49 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or

description that is inconsistent therewith. To the extent that the allegations in Paragraph 35 and Footnotes 48-49 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 35 and Footnotes 48-49 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

36. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 36 and Footnote 51 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 36 and Footnote 51 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 36 and Footnote 51 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 36 and Footnote 51.

37. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 37 and Footnotes 52-54 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 37 and Footnotes 52-54 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 37 and Footnotes 52-54 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these

allegations. To the extent that the allegations in Paragraph 37 and Footnotes 52-54 purport to relate to CH Real Estate, CH Real Estate admits only that RealPage hosts events and meetings for certain users of its software, but denies any characterization of the events and meetings. CH Real Estate denies the remaining allegations in Paragraph 37 and Footnotes 52-54.

38. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 38 and Footnotes 55-57 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 38 and Footnotes 55-57 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 38 and Footnotes 55-57 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 38 and Footnotes 55-57 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

39. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 39 and Footnote 58 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 39 and Footnote 58 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 39 and Footnote 58 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations

in Paragraph 39 and Footnote 58 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

40. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 40 and Figure 5 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 40 and Figure 5 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 40 and Figure 5 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 40 and Figure 5 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

41. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 41 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 41 and Footnote 60 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 41 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

42. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 42 and Footnote 61 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations

in Paragraph 42 and Footnote 61 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 42 and Footnote 61 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 42 and Footnote 61 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

43. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 43 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 43 that relate to other Defendants and/or third parties to this action, and on this basis denies these allegations. CH Real Estate admits that Plaintiffs purport to bring an antitrust action under the per se standard for violations of the federal antitrust laws, but denies that Plaintiffs state a claim under the federal antitrust laws and/or that Plaintiffs are entitled to any of the requested relief. CH Real Estate denies the remaining allegations in Paragraph 43.

III. JURISDICTION AND VENUE

44. CH Real Estate admits that Plaintiffs purport to bring their case pursuant to Sections 4 and 16 of the Clayton Act (15 U.S.C. §§ 15 and 26) and Section 1 of the Sherman Act (15 U.S.C. § 1), and purport to seek certain damages and costs. CH Real Estate Services denies the remaining allegations in Paragraph 44.

45. CH Real Estate admits that this Court has subject matter jurisdiction for purposes of this matter only.

46. CH Real Estate admits that venue is proper in this District for purposes of pretrial proceedings pursuant to the Order of the Judicial Panel on Multidistrict Litigation.

47. CH Real Estate does not contest that it is subject to the personal jurisdiction of this Court for purposes of pretrial proceedings for this matter only. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations concerning whether the other Defendants in this District are subject to the personal jurisdiction of this Court and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 47.

48. Paragraph 48 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 48 as to other Defendants and/or co-conspirators, and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 48.

49. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 49 as to other parties, and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 49.

IV. THE PARTIES

50. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 50 and on this basis denies these allegations.

51. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 51 and on this basis denies these allegations.

52. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 52 and on this basis denies these allegations.

53. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 53 and on this basis denies these allegations.

54. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 54 and on this basis denies these allegations.

55. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 55 and on this basis denies these allegations.

56. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 56 and on this basis denies these allegations.

57. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 57 and on this basis denies these allegations.

58. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 58 and on this basis denies these allegations.

59. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 59 and on this basis denies these allegations.

60. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 60 and on this basis denies these allegations.

61. To the extent that the allegations in Paragraph 61 and Footnotes 62-63 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate otherwise lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 61 and Footnotes 62-63, and on this basis denies these allegations.

62. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 62 and Footnotes 64-67 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 62 and Footnotes 64-67 characterize or describe documents or other

sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate otherwise lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 62 and Footnotes 64-67, and on this basis denies these allegations.

63. To the extent that the allegations in Paragraph 63 and Footnotes 68-70 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate otherwise lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 63 and Footnotes 68-70, and on this basis denies these allegations.

64. To the extent that the allegations in Paragraph 64 and Footnote 71 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate otherwise lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 64 and Footnote 71, and on this basis denies these allegations.

65. To the extent that the allegations in Paragraph 65 and Footnotes 72-74 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate otherwise lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 65 and Footnotes 72-74, and on this basis denies these allegations.

66. To the extent that the allegations in Paragraph 66 and Footnotes 75-78 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate otherwise

lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 66 and Footnotes 75-78, and on this basis denies these allegations.

67. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 67 and on this basis denies these allegations.

68. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 68 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 68 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 68.

69. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 69 and on this basis denies these allegations.

70. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 70 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 70 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 70.

71. CH Real Estate lacks information sufficient to form a belief as to the truth of the allegations in Paragraph 71 and on this basis denies these allegations.

72. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 72 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 72 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 72.

73. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 73 and on this basis denies these allegations.

74. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 74 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 74 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 74.

75. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 75 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 75 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 75.

76. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 76 and on this basis denies these allegations.

77. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 77 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 77 that relate to other

Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 77.

78. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 78 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 78 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 78.

79. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 79 and on this basis denies these allegations.

80. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 80 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 80 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 80.

81. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 81 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 81 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 81.

82. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 82 and on this basis denies these allegations.

83. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 83 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 83 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 83.

84. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 84 and on this basis denies these allegations.

85. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 85 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 85 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 85.

86. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 86 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 86 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 86.

87. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 87 and on this basis denies these allegations.

88. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 88 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 88 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 88.

89. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 89 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 89 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 89.

90. Paragraph 90 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that CH Real Estate Services, LLC is a Delaware limited liability corporation headquartered in Nashville, Tennessee. CH Real Estate admits that it is a privately owned real estate that owned and/or managed multifamily residential properties during the alleged Class Period in the cities identified in Paragraph 90. CH Real Estate denies the remaining allegations in Paragraph 90.

91. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 91 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits only that Ashleigh Von

Einem and Wesley Jones were employed by CH Real Estate for at least part of the alleged Class Period, but deny any characterization of their employment. CH Real Estate denies the remaining allegations in Paragraph 91.

92. CH Real Estate denies the allegations in Paragraph 92.

93. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 93 and on this basis denies these allegations.

94. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 94 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 94 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 94.

95. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 95 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 95 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 95.

96. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 96 and on this basis denies these allegations.

97. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 97 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 97 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 97.

98. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 98 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 98 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 98.

99. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 99 and on this basis denies these allegations.

100. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 100 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 100 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 100.

101. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 101 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 101 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 101.

102. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 102 and on this basis denies these allegations.

103. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 103 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 103 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 103.

104. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 104 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 104 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 104.

105. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 105 and on this basis denies these allegations.

106. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 106 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 106 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 106.

107. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 107 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 107 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 107.

108. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 108 and on this basis denies these allegations.

109. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 109 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 109 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 109.

110. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 110 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 110 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 110.

111. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 111 and on this basis denies these allegations.

112. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 112 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 112 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 112.

113. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 113 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 113 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 113.

114. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 114 and on this basis denies these allegations.

115. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 115 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 115 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 115.

116. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 116 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 116 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 116.

117. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 117 and on this basis denies these allegations.

118. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 118 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 118 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 118.

119. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 119 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 119 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 119.

120. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 120 and on this basis denies these allegations.

121. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 121 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 121 that relate to other

Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 121.

122. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 122 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 122 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 122.

123. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 123 and on this basis denies these allegations.

124. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 124 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 124 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 124.

125. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 125 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 125 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 125.

126. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 126 and on this basis denies these allegations.

127. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 127 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 127 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 127.

128. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 128 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 128 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 128.

129. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 129 and on this basis denies these allegations.

130. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 130 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 130 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 130.

131. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 131 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 131 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 131.

132. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 132 and on this basis denies these allegations.

133. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 133 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 133 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 133.

134. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 134 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 134 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 134.

135. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 135 and on this basis denies these allegations.

136. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 136 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 136 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 136.

137. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 137 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 137 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 137.

138. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 138 and on this basis denies these allegations.

139. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 139 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 139 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 139.

140. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 140 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 140 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 140.

141. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 141 and on this basis denies these allegations.

142. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 142 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 142 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 142.

143. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 143 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 143 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 143.

144. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 144 and on this basis denies these allegations.

145. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 145 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 145 that relate to other

Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 145.

146. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 146 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 146 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 146.

147. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 147 and on this basis denies these allegations.

148. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 148 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 148 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 148.

149. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 149 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 149 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 149.

150. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 150 and on this basis denies these allegations.

151. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 151 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 151 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 151.

152. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 152 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 152 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 152.

153. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 153 and on this basis denies these allegations.

154. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 154 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 154 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 154.

155. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 155 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 155 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 155.

156. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 156 and on this basis denies these allegations.

157. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 157 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 157 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 157.

158. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 158 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 158 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 158.

159. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 159 and on this basis denies these allegations.

160. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 160 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 160 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 160.

161. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 161 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 161 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 161.

162. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 162 and on this basis denies these allegations.

163. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 163 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 163 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 163.

164. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 164 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 164 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 164.

165. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 165 and on this basis denies these allegations.

166. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 166 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 166 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 166.

167. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 167 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 167 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 167.

168. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 168 and on this basis denies these allegations.

169. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 169 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 169 that relate to other

Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 169.

170. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 170 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 170 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 170.

171. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 171 and on this basis denies these allegations.

172. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 172 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 172 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 172.

173. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 173 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 173 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 173.

174. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 174 and on this basis denies these allegations.

175. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 175 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 175 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 175.

176. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 176 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 176 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 176.

177. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 177 and on this basis denies these allegations.

178. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 178 and Footnote 79 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 178 and Footnote 79 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 178 and Footnote 79 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or

information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 178 and Footnote 79.

179. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 179 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 179 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 179.

180. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 180 and on this basis denies these allegations.

181. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 181 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 181 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 181.

182. To the extent the allegations in Paragraph 182 and Footnote 80 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate otherwise lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 182 and Footnote 80 and on this basis denies these allegations.

183. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 183 and Footnote 81 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which

no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 183 and Footnote 81 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 183 and Footnote 81 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 183 and Footnote 81.

184. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 184 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 184 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 184.

185. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 185 and on this basis denies these allegations.

186. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 186 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 186 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 186.

187. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 187 and on this basis denies these allegations.

188. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 188 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 188 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 188.

189. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 189 and on this basis denies these allegations.

190. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 190 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 190 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 190.

191. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 191 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 191 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 191.

192. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 192 and on this basis denies these allegations.

193. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 193 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 193 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 193.

194. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 194 and on this basis denies these allegations.

195. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 195 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 195.

196. Paragraph 196 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required.

197. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 197 and App'x A, Table A-1 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 197 and App'x A, Table A-1 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 197 and App'x A, Table A-1.

198. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 198 and App'x A, Table A-2 contain Plaintiffs' characterization of their claims and/or legal conclusions,

to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 198 and App'x A, Table A-2 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegation in Paragraph 198 and App'x A, Table A-2 purport to relate to CH Real Estate, CH Real Estate admits only that it owned and/or managed multifamily residential properties during the alleged Class Period and that certain multifamily residential properties CH Real Estate owned and/or managed during the alleged Class Period used RealPage's RMS for at least part of the alleged Class Period, but denies any characterization of CH Real Estate's use of RealPage's RMS. CH Real Estate denies the remaining allegations in Paragraph 198 and App'x A, Table A-2.

199. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 199 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 199 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 199.

200. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 200 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 200 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. To the

extent that the allegations in Paragraph 200 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

201. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 201 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 201 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 201.

V. FACTUAL ALLEGATIONS

A. Historical Competition Among Residential Property Managers.

202. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 202 and Footnote 82 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 202 and Footnote 82 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 202 and Footnote 82 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 202 and Footnote 82 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

203. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 203 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 203 that relate to other

Defendants and/or third parties to this action, and on that basis denies these allegations. To the extent that the allegations in Paragraph 203 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

204. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 204 and Footnote 83 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 204 and Footnote 83 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 204 and Footnote 83 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 204 and Footnote 83 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

205. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 205 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 205 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. To the extent that the allegations in Paragraph 205 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

206. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 206 and Footnotes 84-85 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the

allegations in Paragraph 206 and Footnotes 84-85 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 206 and Footnotes 84-85 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 206 and Footnotes 84-85 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

207. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 207 and Footnotes 86-87 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 207 and Footnotes 86-87 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 207 and Footnotes 86-87 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 207 and Footnotes 86-87 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

B. Evolution of RealPage's Revenue Management Solutions.

208. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 208 and Footnote 88 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 208 and Footnote 88 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 208 and Footnotes 88

relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 208 and Footnotes 88 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

209. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 209 and Footnotes 89-91 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 209 and Footnotes 89-91 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 209 and Footnotes 89-91 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 209 and Footnotes 89-91 purport to relate to CH Real Estate, CH Real Estate admits only that RealPage collects certain data from CH Real Estate, but denies any characterization of that data. CH Real Estate denies the remaining allegations in Paragraph 209 and Footnotes 89-91.

210. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 210 and Footnotes 92-97 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 210 and Footnotes 92-97 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 210 and Footnotes 92-97 relate to other Defendants and/or third parties to this action, CH Real Estate lacks

knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 210 and Footnotes 92-97 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

211. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 211 and Footnotes 98-101 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 211 and Footnotes 98-101 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 211 and Footnotes 98-101 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 211 and Footnotes 98-101 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

212. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 212 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 212 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. To the extent that the allegations in Paragraph 212 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

213. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 213 and Footnotes 102-103 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the

allegations in Paragraph 213 and Footnotes 102-103 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 213 and Footnotes 102-103 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 213 and Footnotes 102-103.

214. Paragraph 214 and Footnote 104 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 214 and Footnote 104 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 214 and Footnote 104 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 214 and Footnote 104.

215. Paragraph 215 and Footnotes 105-106 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the information set forth in the second sentence of Paragraph 215, and on that basis denies the allegation. To the extent that the allegations in Paragraph 215 and Footnotes 105-106 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in

Paragraph 215 and Footnotes 105-106 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 215 and Footnote 105-106.

216. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 216 and Footnotes 107-109 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 216 and Footnotes 107-109 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 216 and Footnotes 107-109 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 216 and Footnotes 107-109 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

217. Paragraph 217 and Footnotes 110-111 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, **and** to the extent that the allegations in Paragraph 217 and Footnotes 110-111 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 217 and Footnotes 110-111 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 217 and Footnote 110-111.

218. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 218 and Footnotes 112-113 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 218 and Footnotes 112-113 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 218 and Footnotes 112-113 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 218 and Footnotes 112-113 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

219. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 219 and Footnote 114 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 219 and Footnote 114 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 219 and Footnote 114 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 219 and Footnote 114 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

220. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 220 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph

220 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 220 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 220.

221. Paragraph 221 and Footnotes 115-120 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 221 and Footnotes 115-120 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 221 and Footnotes 115-120 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 221 and Footnotes 115-120.

222. Paragraph 222 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 222 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 222 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 222.

223. Paragraph 223 and Footnotes 121-123 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 223 and Footnotes 121-123 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 223 and Footnotes 121-123 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 223 and Footnotes 121-123.

224. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 224 and Footnotes 124-125 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 224 and Footnotes 124-125 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 224 and Footnotes 124-125 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 224 and Footnotes 124-125.

225. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 225 and Footnote 126 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 225 and Footnote 126 characterize or describe documents or other sources, such

sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 225 and Footnote 126 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 225 and Footnote 126 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

226. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 226, Figure 6, and Footnote 127 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 226, Figure 6, and Footnote 127 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 226, Figure 6, and Footnote 127 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 226, Figure 6, and Footnote 127 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

C. Property Management Companies Effectively Outsourced Pricing and Supply Decisions to RealPage, Eliminating Competition.

227. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 227 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. To the

extent that the allegations in Paragraph 227 purport to relate to CH Real Estate, CH Real Estate admits only that RealPage collects certain data from CH Real Estate, but denies any characterization of that data. CH Real Estate denies the remaining allegations in Paragraph 227.

228. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 228 and Footnote 128 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 228 and Footnote 128 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 228 and Footnote 128.

229. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 229 and Footnote 129 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 229 and Footnote 129 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 229 and Footnote 129.

230. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 230 and Footnotes 130-131 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 230 and Footnotes 130-131 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 230 and

Footnotes 130-131 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 230 and Footnotes 130-131 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

231. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 231 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 231 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. To the extent that the allegations in Paragraph 231 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

232. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 232 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 232 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 232 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

233. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 233 and Footnotes 132-133 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 233 and Footnote 133 characterize or describe documents or other

sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 233 and Footnote 133 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 233 and Footnote 133.

234. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 234 and Footnotes 134-135 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 234 and Footnotes 134-135 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 234 and Footnotes 134-135 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 234 and Footnotes 134-135 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

235. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 235 and Footnotes 136-138 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 235 and Footnotes 136-138 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 235 and Footnotes 136-138 relate to other Defendants and/or third parties to this action, CH Real Estate

lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 235 and Footnotes 136-138 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

236. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 236 and Footnote 139 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 236 and Footnote 139 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 236 and Footnote 139 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 236 and Footnote 139 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

237. To the extent that the allegations in Paragraph 237 and Footnote 140 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 237 and Footnote 140.

238. To the extent that the allegations in Paragraph 238 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 238.

239. To the extent that the allegations in Paragraph 239 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 239.

240. Paragraph 240 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 240 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 240.

241. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 241 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 241 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 241 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 241.

242. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 242 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph

242 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 242 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations.

243. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 243 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 243 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 243 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 243.

244. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 244 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 244 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 244 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth

and on this basis denies these allegations. To the extent that the allegations in Paragraph 244 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

245. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 245 and Footnote 141 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 245 and Footnote 141 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 245 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

246. To the extent that the allegations in Paragraph 246 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 246.

247. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 247 and Footnotes 142-143 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 247 and Footnotes 142-143 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 247 and Footnotes 142-143.

248. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 248 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 248 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 248 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

249. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 249 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 249 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 249 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

250. To the extent that the allegations in Paragraph 250 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 250.

251. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 251 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response

is required. To the extent a response is required, and to the extent that the allegations in Paragraph 251 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 251 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

252. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 252 and Footnotes 145-146 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 252 and Footnotes 145-146 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 252 and Footnotes 145-146 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 252 Footnotes 145-146 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

253. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 253 and Footnotes 147-148 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 253 and Footnotes 147-148 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 253 and Footnotes 147-148 relate to other Defendants and/or third parties to this action, CH Real Estate

lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 253 Footnotes 147-148 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

254. To the extent that the allegations in Paragraph 254 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 254.

D. Defendants Collectively Monitor Compliance with the Scheme.

255. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 255 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 255 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 255 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 255 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

256. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 256 and Figure 7 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 256 and Figure 7 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. Footnote 149 contains Plaintiffs' explanation of defined terms, to which

no response is required. To the extent that the allegations in Paragraph 256 and Figure 7 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 256 and Figure 7 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

257. To the extent that the allegations in Paragraph 257 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 257.

258. To the extent that the allegations in Paragraph 258 and Figure 6 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 258 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 258 and Figure 6.

259. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 259 and Figure 8 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 259 and Figure 8 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 259 and Figure 8 relate to

other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 259 and Figure 8 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

260. To the extent that the allegations in Paragraph 260 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 260.

261. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 261 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 261 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 261.

262. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 262 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 262 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 262 relate to other Defendants and/or third parties to this

action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 262 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

263. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 263 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 263 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 263.

264. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 264 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 264 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 264.

265. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 265 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 265 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to

form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 265.

266. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 266 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 266 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 266.

267. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 267 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 267 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 267.

268. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 268 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 268 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the

allegations in Paragraph 268 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

269. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 269 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 269 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 269 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

270. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 270 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 270 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 270 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 270.

271. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 271 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 271 characterize or describe documents or other sources, such sources speak for themselves, and

CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 271 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 271.

272. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 272 and Footnote 150 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 272 and Footnote 150 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 272 and Footnote 150 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

273. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 273 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 273 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 273 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 273 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

274. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 274 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 274 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 274 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 274 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

275. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 275 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 275 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 275.

276. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 276 and Footnote 151 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 276 and Footnote 151 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 276 and Footnote 151 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or

information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 276 and Footnote 151.

277. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 277 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 277 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 277.

278. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 278 and Footnote 152 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 278 and Footnote 152 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 278 and Footnote 152 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 278 and Footnote 152 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

279. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 279 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph

279 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 279.

280. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 280 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 280 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 280.

281. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 281 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 281 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 281.

282. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 282 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 282 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 282.

283. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 283 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 283 and Footnote 153 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 283.

284. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 284 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 284 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 284.

285. Paragraph 285 and Footnotes 154-155 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 285 and Footnotes 154-155 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 285 and Footnotes 154-155 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this

basis denies these allegations. To the extent that the allegations in Paragraph 285 and Footnotes 154-155 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

286. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 286 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 286 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 286.

E. Property Owners and Managers Who Adopted RealPage's Pricing Recommendations Did So With the Common Goal of Raising Rent Prices Which Caused Inflated Rental Prices and Reduced Occupancy Levels in Their Respective Metro Areas.

287. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 287 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 287 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. To the extent that the allegations in Paragraph 287 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

288. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 288 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 288 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the

extent that the allegations in Paragraph 288 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 288 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

289. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 289 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 289 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 289 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 289 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

290. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 290 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 290 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 290 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 290 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

291. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 291 and Footnotes 156-159 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 291 and Footnotes 156-159 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 291 and Footnotes 156-159 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 291 and Footnotes 156-159 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

292. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 292 and Footnotes 160-163 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 292 and Footnotes 160-163 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 292 and Footnotes 160-163 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 292 and Footnotes 160-163 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

293. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 293 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 293 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 293.

294. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 294 and Footnote 164 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 294 and Footnote 164 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 294 and Footnote 164 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 294 and Footnote 164 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

295. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 295 and Footnote 165 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 295 and Footnote 165 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 295 and Footnote 165 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 295 and Footnote 165 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

296. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 296 and Footnote 166 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 296 and Footnote 166 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 296 and Footnote 166 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 296 and Footnote 166.

297. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 297 and Footnotes 167-168 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 297 and Footnotes 167-168 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 297 and Footnotes 167-168 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 297 and Footnotes 167-168.

298. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 298 and Footnotes 169-171 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 298 and Footnotes 169-171 characterize or describe documents or other

sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 298 and Footnotes 169-171 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 298 and Footnotes 169-171 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

299. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 299 and Footnotes 172-174 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 299 and Footnotes 172-174 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 299 and Footnotes 172-174 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 299 and Footnotes 172-174 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

300. Paragraph 300 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 300 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 300 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information

sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 300.

301. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 301 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 301 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 301.

302. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 302 and Footnote 175 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 302 and Footnote 175 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 302 and Footnote 175 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 302 and Footnote 175.

303. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 303 and Footnotes 176-177 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 303 and Footnotes 176-177 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or

description that is inconsistent therewith. To the extent that the allegations in Paragraph 303 and Footnotes 176-177 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 303 and Footnotes 176-177 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

304. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 304 and Footnote 178 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 304 and Footnote 178 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 304 and Footnote 178 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 304 and Footnote 178 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

305. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 305 and Footnotes 179-180 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 305 and Footnotes 179-180 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 305 and Footnotes 179-180 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies

these allegations. To the extent that the allegations in Paragraph 305 and Footnotes 179-180 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

306. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 306 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 306 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 306.

307. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 307 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 307 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 307.

308. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 308 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 308 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 308.

309. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 309 and Footnote 181 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 309 and Footnote 181 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 309 and Footnote 181 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 309 and Footnote 181 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

310. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 310 and Footnote 182 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 310 and Footnote 182 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 310 and Footnote 182 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 310 and Footnote 182.

311. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 311 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 311 characterize or describe documents or other sources, such sources speak for themselves, and

CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 311 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 311 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

312. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 312 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 312 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. To the extent that the allegations in Paragraph 312 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

F. Property Owners and Managers Conspired Through Trade Associations to Standardize Lease Terms Unfavorable to Plaintiffs and Members of the Class.

313. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 313 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 313.

314. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 314 and Footnotes 183-184 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 314 and Footnotes 183-184 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 314 and

Footnotes 183-184 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 314 and Footnotes 183-184.

315. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 315 and Footnotes 185-187 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 315 and Footnotes 185-187 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 315 and Footnotes 185-187 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 315 and Footnotes 185-187.

316. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 316 and Footnote 188 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 316 and Footnote 188 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 316 and Footnotes 188 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 316 and Footnote 188.

317. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 317 and Footnotes 189-191 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 317 and Footnotes 189-191 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 317 and Footnotes 189-191 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 317 and Footnotes 189-191.

318. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 318 and Footnote 192 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 318 and Footnote 192 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 318 and Footnote 192 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 318 and Footnote 192.

319. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 319 and Footnotes 193-194 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 319 and Footnotes 193-194 characterize or describe documents or other

sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 319 and Footnotes 193-194 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 319 and Footnotes 193-194.

320. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 320 and Footnote 195 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 320 and Footnote 195 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 320 and Footnote 195 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 320 and Footnote 195.

321. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 321 and Footnotes 196-197 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 321 and Footnotes 196-197 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 321 and Footnotes 196-197 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies

these allegations. CH Real Estate denies the remaining allegations in Paragraph 321 and Footnotes 196-197.

322. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 322 and Footnote **198** contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 322 and Footnote 198 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 322 and Footnote 198 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 322 and Footnote 198.

323. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 323 and Footnote 199 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 323 and Footnote 199 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 323 and Footnote 199 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 323 and Footnote 199.

324. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 324 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response

is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 324.

325. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 325 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 325 and on this basis denies these allegations.

326. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 326 and on this basis denies these allegations.

327. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 327 and on this basis denies these allegations.

328. Paragraph 328 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 328 and on this basis denies these allegations.

329. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 329 and on this basis denies these allegations.

330. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 330 and on this basis denies these allegations.

331. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 331 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 331 characterize or describe documents or other sources, such sources speak for themselves, and

CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 331 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 331 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

G. Preliminary Economic Analysis Confirms the Impact of RealPage's Revenue Management on Multifamily Rental Markets Nationwide.

332. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 332 contains Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 332.

i. Defendants' Increased Revenues Resulted from Proportionally Higher, Artificially Inflated Rent Increases.

333. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 333 and Footnotes 200-201 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 333 and Footnotes 200-201 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 333 and Footnotes 200-201 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 333 and Footnotes 200-201 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

334. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 334 and Figure 9 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert

testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 334 and Figure 9 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 334 and Figure 9.

335. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 335 and Figure 10 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 335 and Figure 10 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 335 and Figure 10.

336. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 336 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 336 relate to other Defendants and/or third parties to this action, such as by purporting to refer to statements by confidential witnesses, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 336 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

ii. Owners, Owner-Operators, and Managing Defendants Engaged in Tacit Collusion to Artificially Increase Multifamily Rental Prices.

337. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 337 and Appendix B contain Plaintiffs' characterization of their claims, allegations subject to proof by

expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 337 and Appendix B that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. To the extent that the allegations in Paragraph 337 and Appendix B purport to relate to CH Real Estate, CH Real Estate denies these allegations.

338. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 338 and Figures 11-19 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 338 and Figures 11-19 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. To the extent that the allegations in Paragraph 338 and Figures 11-19 purport to relate to CH Real Estate, CH Real Estate admits that Plaintiffs purport to depict certain data in Figures 11-19. CH Real Estate denies the remaining allegations in Paragraph 338 and Figures 11-19.

339. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 339 and Figure 11 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 339 and Figure 11 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 339 and Figure 11 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth

and on this basis denies these allegations. To the extent that the allegations in Paragraph 339 and Figure 11 purport to relate to CH Real Estate, CH Real Estate admits only that it owned and/or managed multifamily residential properties in Nashville during the alleged Class Period and that Plaintiffs purport to depict certain data in Figure 11. CH Real Estate denies the remaining allegations in Paragraph 339 and Figure 11.

340. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 340 and Figure 12 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 340 and Figure 12 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 340 and Figure 12 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 340 and Figure 12 purport to relate to CH Real Estate, CH Real Estate admits only that it owned and/or managed multifamily residential properties in Atlanta during the alleged Class Period and that Plaintiffs purport to depict certain data in Figure 12. CH Real Estate denies the remaining allegations in Paragraph 340 and Figure 12.

341. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 341 and Figure 13 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 341 and Figure 13 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate

denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 341 and Figure 13 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 341 and Figure 13.

342. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 342 and Figure 14 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 342 and Figure 14 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 342 and Figure 14 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 342 and Figure 14 purport to relate to CH Real Estate, CH Real Estate admits only that it owned and/or managed multifamily residential properties in Dallas during the alleged Class Period and that Plaintiffs purport to depict certain data in Figure 14. CH Real Estate denies the remaining allegations in Paragraph 342 and Figure 14.

343. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 343 and Figure 15 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 343 and Figure 15 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate

denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 343 and Figure 15 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 343 and Figure 15.

344. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 344 and Figure 16 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 344 and Figure 16 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 344 and Figure 16 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 344 and Figure 16.

345. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 345 and Figure 17 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 345 and Figure 17 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 345 and Figure 17 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth

and on this basis denies these allegations. To the extent that the allegations in Paragraph 345 and Figure 17 purport to relate to CH Real Estate, CH Real Estate admits only that it owned and/or managed multifamily residential properties in Miami during the alleged Class Period and that Plaintiffs purport to depict certain data in Figure 17. CH Real Estate denies the remaining allegations in Paragraph 345 and Figure 17.

346. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 346 and Figure 18 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 346 and Figure 18 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 346 and Figure 18 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 346 and Figure 18.

347. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 347 and Figure 19 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 347 and Figure 19 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 347 and Figure 19 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth

and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 347 and Figure 19.

348. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 348 and Figures 20-28 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 348 and Figures 20-28 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 348 and Figures 20-28 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 348 and Figures 20-28 purport to relate to CH Real Estate, CH Real Estate admits that Plaintiffs purport to depict certain data in Figures 20-28. CH Real Estate denies the remaining allegations in Paragraph 348 and Figures 20-28.

349. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 349 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 349 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. To the extent that the allegations in Paragraph 349 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

350. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 350 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response

is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 350.

iii. Supply and Demand Factors Do Not Explain Inflated Rental Prices.

351. Paragraph 351 contains Plaintiffs' explanation of a statistical method, to which no response is required.

352. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 352 contains Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. In addition, the second sentence of Paragraph 352 contains Plaintiffs' explanation of a defined term, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 352.

353. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 353 and Figure 29 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 353 and Figure 29 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 353 and Figure 29 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 353 and Figure 29 purport to relate to CH Real Estate, CH Real Estate admits that Plaintiffs purport to depict certain data in Figure 29. CH Real Estate denies the remaining allegations in Paragraph 353 and Figure 29.

354. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 354 and Figures 30, 32-36 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 354 and Figures 30, 32-36 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 354 and Figures 30, 32-36 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 354 and Figures 30, 32-36 purport to relate to CH Real Estate, CH Real Estate admits that Plaintiffs purport to depict certain data in Figures 30, 32-36. CH Real Estate denies the remaining allegations in Paragraph 354 and Figures 30, 32-36.

iv. Atlanta Submarket.

355. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 355 and Figure 30 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figures set forth in the first and second sentences of Paragraph 355, and on that basis denies the allegations. To the extent that the allegations in Paragraph 355 and Figure 30 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 355 and Figure 30 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 355 and Figure 30 purport

to relate to CH Real Estate, CH Real Estate admits that Plaintiffs purport to depict certain data in Figure 30. CH Real Estate denies the remaining allegations in Paragraph 355 and Figure 30.

356. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 356 and Figure 30 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. In addition, Footnote 206 contains Plaintiffs' explanation of a statistical measure, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figures set forth in the third, fourth, and fifth sentences of Paragraph 356, and on that basis denies the allegations. To the extent that the allegations in Paragraph 356 and Figure 30 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 356 and Figure 30 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 356 and Figure 30 purport to relate to CH Real Estate, CH Real Estate admits that Plaintiffs purport to depict certain data in Figure 30. CH Real Estate denies the remaining allegations in Paragraph 356 and Figure 30.

357. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 357 and Figure 30 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 357 and Figure 30 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the

allegations in Paragraph 357 and Figures 30 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 357 and Figure 30 purport to relate to CH Real Estate, CH Real Estate admits that Plaintiffs purport to depict certain data in Figure 30. CH Real Estate denies the remaining allegations in Paragraph 357 and Figure 30.

358. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 358, Figure 30, and Footnote 207 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the fourth sentence of Paragraph 358, and on that basis denies the allegation. To the extent that the allegations in Paragraph 358 and Figure 30 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 358 and Figures 30 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 357 and Figure 30 purport to relate to CH Real Estate, CH Real Estate admits that Plaintiffs purport to depict certain data in Figure 30. CH Real Estate denies the remaining allegations in Paragraph 358 and Figure 30.

359. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 359 and Figure 31 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is

required, and to the extent that the allegations in Paragraph 359 and Figure 31 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 359 and Figure 31 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 359 and Figure 31.

360. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 360 and Figure 31 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figures set second and third sentence of Paragraph 360, and on that basis denies the allegations. To the extent that the allegations in Paragraph 360 and Figure 31 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 360 and Figure 31 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 360 and Figure 31.

v. Orlando Submarket.

361. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 361 and Figure 32 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the first, fourth, fifth, and sixth sentences of Paragraph 361, and on that basis denies the

allegation. To the extent that the allegations in Paragraph 361 and Figure 32 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 361 and Figure 32 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 361 and Figure 32 purport to relate to CH Real Estate, CH Real Estate admits that Plaintiffs purport to depict certain data in Figure 32. CH Real Estate denies the remaining allegations in Paragraph 361 and Figure 32.

vi. Phoenix Submarket.

362. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 362 and Figure 33 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the first through fourth sentences of Paragraph 362, and on that basis denies the allegation. To the extent that the allegations in Paragraph 362 and Figure 33 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 362 and Figure 33 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 362 and Figure 33.

vii. Fort Worth (Dallas Submarket).

363. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 363 and Figure 34 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the first sentence of Paragraph 363, and on that basis denies the allegation. To the extent that the allegations in Paragraph 363 and Figure 34 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 363 and Figure 34 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 363 and Figure 34 purport to relate to CH Real Estate, CH Real Estate admits that Plaintiffs purport to depict certain data in Figure 34. CH Real Estate denies the remaining allegations in Paragraph 363 and Figure 34.

364. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 364 and Figure 34 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the first through third sentences of Paragraph 364, and on that basis denies the allegation. To the extent that the allegations in Paragraph 364 and Figure 34 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 364 and Figure 34 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis

denies these allegations. To the extent that the allegations in Paragraph 364 and Figure 34 purport to relate to CH Real Estate, CH Real Estate admits that Plaintiffs purport to depict certain data in Figure 34. CH Real Estate denies the remaining allegations in Paragraph 364 and Figure 34.

365. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 365 contains Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 365.

H. "Plus Factors" in the Multifamily Rental Housing Market Provide Additional Evidence of a Price Fixing Conspiracy.

366. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 366 and Footnotes 208-209 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 366 and Footnotes 208-209.

367. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 367 and contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 367.

i. The Multifamily Rental Market Is Highly Concentrated.

368. Paragraph 368 and Footnote 210 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 368 and Footnote 210 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate otherwise lacks knowledge or information sufficient to form a belief as to the precise figures set forth in the fourth

and fifth sentences of Paragraph 368, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 368 and Footnote 210.

ii. High Barriers to Entry.

369. Paragraph 369 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 369.

370. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 370 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 370.

371. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 371 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 371.

iii. High Switching Costs for Renters.

372. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 372 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 372 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. To the extent that the allegations in Paragraph 372 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

373. Paragraph 373 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 373.

374. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 374 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 374 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. To the extent that the allegations in Paragraph 374 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

iv. Inelasticity of Demand.

375. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 375 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 375.

376. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 376 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 376.

v. Multifamily Rental Housing Units Are a Fungible Product.

377. Paragraph 377 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 377.

378. Paragraph 378 and Footnote 211 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 378 and Footnote 211 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 378 and Footnote 211 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 378 and Footnote 211.

379. Paragraph 379 and Footnote 212 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 379 and Footnote 212 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 379 and Footnote 212 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 379 and Footnote 212 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

vi. Defendants Exchange Competitively Sensitive Information.

380. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 380 and Footnote 213 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 380 and Footnote 213 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that

is inconsistent therewith. To the extent that the allegations in Paragraph 380 and Footnote 213 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 380 and Footnote 213 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

vii. Motive, Opportunities, and Invitations to Collude.

381. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 381 and Footnote 214 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 381 and Footnote 214 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 381 and Footnote 214 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 381 and Footnote 214.

382. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 382 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 382 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 382 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 382.

383. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 383 and Footnotes 215-216 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 383 and Footnotes 215-216 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 383 and Footnotes 215-216 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 383 and Footnotes 215-216 purport to relate to CH Real Estate, CH Real Estate admits only that RealPage hosts events and meetings for certain users of its software, but denies any characterization of the events and meetings. CH Real Estate denies the remaining allegations in Paragraph 383 and 215-216.

384. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 384 and Footnotes 217-218 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 384 and Footnotes 217-218 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 384 and Footnotes 217-218 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. To the extent that the allegations in Paragraph 384 and Footnotes 217-218 purport to relate to CH Real Estate, CH Real Estate admits only that RealPage hosts events and meetings for certain users of its software, but denies any characterization of the events and

meetings. CH Real Estate denies the remaining allegations in Paragraph 384 and Footnotes 217-218.

385. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 385 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 385 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. To the extent that the allegations in Paragraph 385 purport to relate to CH Real Estate, CH Real Estate admits only that RealPage hosts events and meetings for certain users of its software, but denies any characterization of the events and meetings. CH Real Estate denies the remaining allegations in Paragraph 385.

386. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 386 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 386 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. To the extent that the allegations in Paragraph 386 purport to relate to CH Real Estate, CH Real Estate denies these allegations.

387. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 387 and Footnote 219 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 387 and Footnote 219 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that

is inconsistent therewith. To the extent that the allegations in Paragraph 387 and Footnote 219 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 387 and Footnote 219.

388. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 388 and Footnote 220 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 388 and Footnote 220 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 388 and Footnote 220 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 388 and Footnote 220.

389. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 389 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 389.

390. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 390, and on that basis denies these allegations.

391. CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 391, and on that basis denies these allegations.

VI. RELEVANT MARKET

392. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 392 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response

is required. To the extent a response is required, CH Real Estate admits only that Plaintiffs purport to bring an antitrust action under the per se standards for violations of the federal antitrust laws, but denies that Plaintiffs state a claim under the federal antitrust laws and/or that Plaintiffs are entitled to any of the requested relief. CH Real Estate denies the remaining allegations in Paragraph 392.

393. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 393 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits only that Plaintiffs purport that the Court could analyze the case under the "quick look" mode of analysis, but denies that Plaintiffs state a claim under the federal antitrust laws and/or that Plaintiffs are entitled to any of the requested relief. CH Real Estate denies the remaining allegations in Paragraph 393.

A. The Relevant Product Market Is Multifamily Residential Real Estate Leases.

394. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 394 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 394.

395. Paragraph 395 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 395.

396. Paragraph 396 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 396.

397. To the extent that the allegations in Paragraph 397 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any

characterization or description that is inconsistent therewith. CH Real Estate otherwise lacks knowledge or information sufficient to form a belief as to the truth of the allegation in Paragraph 397, and on this basis denies these allegations.

398. Paragraph 398 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 398.

399. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 399 and Figures 9-10 contain Plaintiffs' characterization of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 399 and Figures 9-10 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 399 and Figures 9-10 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 399 and Figures 9-10.

B. Defendants' Market Power in the Multifamily Residential Real Estate Market.

400. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 400 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 400.

401. Paragraph 401 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 401.

402. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 402 and Figure 35 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 402 and Figure 35 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 402 and Figure 35 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 402 and Figure 35.

403. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 403 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 403 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 403 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 403.

404. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 404 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 404.

C. Regional Submarkets

405. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 405 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 405 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 405.

406. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 406 and Appendix C contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 406 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate admits that it owned and/or managed multifamily residential properties during the alleged Class Period in at least: Atlanta, Birmingham, Charlotte, Dallas-Fort Worth, Indianapolis, Miami, Nashville, Orlando, Saint Louis, and Tampa. CH Real Estate denies the remaining allegations in Paragraph 406.

407. To the extent that the allegations in Paragraph 407 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate otherwise lacks knowledge or information sufficient to form a belief as to the truth of these allegations in Paragraph 407, and on this basis denies these allegations.

408. Paragraph 408 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 408.

409. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 409 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 409.

i. Nashville, Tennessee

410. Paragraph 410 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 410, and on that basis denies the allegation. To the extent that the allegations in Paragraph 410 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 410.

411. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 411, Footnote 222, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 411, and on that basis denies the allegation. To the extent that the allegations in Paragraph 411, Footnote 222, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 411, Footnote 222, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 411, Footnote 222, and the accompanying map.

412. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 412 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 412, and on that basis denies the allegations. To the extent that the allegations in Paragraph 412 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 412.

413. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 413 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 413 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. To the extent that the allegations in Paragraph 413 purport to relate to CH Real Estate, CH Real Estate admits only that it owned and/or managed multifamily residential properties in Nashville during the alleged Class Period and that certain multifamily residential properties CH Real Estate owned and/or managed in Nashville during the alleged Class Period used RealPage's RMS for at least part of the alleged Class Period, but denies any characterization of CH Real Estate's use of RealPage's RMS. CH Real Estate denies the remaining allegations in Paragraph 413.

414. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 414 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to

form a belief as to the accuracy of the precise figure set forth in Paragraph 414, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 414.

415. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 415 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 415.

ii. Atlanta, Georgia

416. Paragraph 416 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 416, and on that basis denies the allegation. To the extent that the allegations in Paragraph 416 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 416.

417. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 417, Footnote 223, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 417, and on that basis denies the allegation. To the extent that the allegations in Paragraph 417, Footnote 223, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 417, Footnote 223, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth

and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 417, Footnote 223, and the accompanying map.

418. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 418 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 418, and on that basis denies the allegations. To the extent that the allegations in Paragraph 418 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 418.

419. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 419 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 419 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. To the extent that the allegations in Paragraph 419 purport to relate to CH Real Estate, CH Real Estate admits only that it owned and/or managed multifamily residential properties in Atlanta during the alleged Class Period and that certain multifamily residential properties CH Real Estate owned and/or managed in Atlanta during the alleged Class Period used RealPage's RMS for at least part of the alleged Class Period, but denies any characterization of CH Real Estate's use of RealPage's RMS. CH Real Estate denies the remaining allegations in Paragraph 419.

420. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 420 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response

is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 420, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 420.

421. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 421 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 421.

iii. Austin, Texas

422. Paragraph 422 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 422, and on that basis denies the allegation. To the extent that the allegations in Paragraph 422 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 422.

423. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 423, Footnote 224, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 423, and on that basis denies the allegation. To the extent that the allegations in Paragraph 423, Footnote 224, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 423, Footnote 224, or the accompanying map relate to other Defendants and/or third parties to this

action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 423, Footnote 224, and the accompanying map.

424. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 424 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 424, and on that basis denies the allegations. To the extent that the allegations in Paragraph 424 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 424.

425. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 425 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 425 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 425.

426. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 426 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 426, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 426.

427. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 427 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 427.

iv. Baltimore, Maryland

428. Paragraph 428 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 428, and on that basis denies the allegation. To the extent that the allegations in Paragraph 428 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 428.

429. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 429, Footnote 225, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 429, and on that basis denies the allegation. To the extent that the allegations in Paragraph 429, Footnote 225, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 429, Footnote 225, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 429, Footnote 225, and the accompanying map.

430. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 430 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 430, and on that basis denies the allegations. To the extent that the allegations in Paragraph 430 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 430.

431. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 431 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 431 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 431.

432. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 432 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 432, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 432.

433. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 433 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 433.

434. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 434 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the information set forth in Paragraph 434, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 434.

v. Boston, Massachusetts

435. Paragraph 435 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 435, and on that basis denies the allegation. To the extent that the allegations in Paragraph 435 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 435.

436. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 436, Footnote 226, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 436, and on that basis denies the allegation. To the extent that the allegations in Paragraph 436, Footnote 226, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 436, Footnote 226, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth

and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 436, Footnote 226, and the accompanying map.

437. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 437 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 437, and on that basis denies the allegations. To the extent that the allegations in Paragraph 437 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 437.

438. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 438 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 438 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 438.

439. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 439 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 439, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 439.

440. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 440 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response

is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 440.

441. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 441 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the information set forth in Paragraph 441, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 441.

vi. Charlotte, North Carolina

442. Paragraph 442 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 442, and on that basis denies the allegation. To the extent that the allegations in Paragraph 442 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 442.

443. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 443, Footnote 227, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 443, and on that basis denies the allegation. To the extent that the allegations in Paragraph 443, Footnote 227, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 443, Footnote 227, or the accompanying map relate to other Defendants and/or third parties to this

action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 443, Footnote 227, and the accompanying map.

444. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 444 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 444, and on that basis denies the allegations. To the extent that the allegations in Paragraph 444 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 444.

445. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 445 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 445 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. To the extent that the allegations in Paragraph 445 purport to relate to CH Real Estate, CH Real Estate admits only that it owned and/or managed multifamily residential properties in Charlotte during the alleged Class Period and that certain multifamily residential properties CH Real Estate owned and/or managed in Charlotte during the alleged Class Period used RealPage's RMS for at least part of the alleged Class Period, but denies any characterization of CH Real Estate's use of RealPage's RMS. CH Real Estate denies the remaining allegations in Paragraph 445.

446. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 446 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 446, and on that basis denies the allegations. CH Real Estate denies the remaining allegations in Paragraph 446.

447. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 447 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 447.

vii. Chicago, Illinois

448. Paragraph 448 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 448, and on that basis denies the allegation. To the extent that the allegations in Paragraph 448 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 448.

449. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 449, Footnote 228, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 449, and on that basis denies the allegation. To the extent that the allegations in Paragraph 449, Footnote 228, or the accompanying map characterize or describe documents or

other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 449, Footnote 228, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 449, Footnote 228, and the accompanying map.

450. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 450 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 450, and on that basis denies the allegations. To the extent that the allegations in Paragraph 450 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 450.

451. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 451 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 451 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 451.

452. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 452 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to

form a belief as to the accuracy of the precise figure set forth in Paragraph 452, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 452.

453. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 453 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 453.

viii. Dallas, Texas

454. Paragraph 454 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 454, and on that basis denies the allegation. To the extent that the allegations in Paragraph 454 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 454.

455. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 455, Footnote 229, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 455, and on that basis denies the allegation. To the extent that the allegations in Paragraph 455, Footnote 229, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 445, Footnote 229, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth

and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 445, Footnote 229, and the accompanying map.

456. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 456 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 456, and on that basis denies the allegations. To the extent that the allegations in Paragraph 456 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 456.

457. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 457 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 457 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. To the extent that the allegations in Paragraph 457 purport to relate to CH Real Estate, CH Real Estate admits only that it owned and/or managed multifamily residential properties in Dallas during the alleged Class Period and that certain multifamily residential properties CH Real Estate owned and/or managed in Dallas during the alleged Class Period used RealPage's RMS for at least part of the alleged Class Period, but denies any characterization of CH Real Estate's use of RealPage's RMS. CH Real Estate denies the remaining allegations in Paragraph 457.

458. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 458 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response

is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 458, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 458.

459. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 459 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 459.

ix. Denver, Colorado

460. Paragraph 460 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 460, and on that basis denies the allegation. To the extent that the allegations in Paragraph 460 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 460.

461. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 461, Footnote 230, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 461, and on that basis denies the allegation. To the extent that the allegations in Paragraph 461, Footnote 230, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 461, Footnote 230, or the accompanying map relate to other Defendants and/or third parties to this

action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 461, Footnote 230, and the accompanying map.

462. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 462 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 462, and on that basis denies the allegations. To the extent that the allegations in Paragraph 462 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 462.

463. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 463 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 463 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 463.

464. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 464 and Footnote 231 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 464 and Footnote 231 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that

is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 464 and Footnote 231.

465. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 465 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 465.

466. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 466 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the information set forth in Paragraph 466, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 466.

x. Detroit, Michigan

467. Paragraph 467 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 467, and on that basis denies the allegation. To the extent that the allegations in Paragraph 467 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 467.

468. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 468, Footnote 232, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 468, and on that basis denies the allegation. To the extent that the allegations

in Paragraph 468, Footnote 232, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 468, Footnote 232, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 468, Footnote 232, and the accompanying map.

469. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 469 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 469, and on that basis denies the allegations. To the extent that the allegations in Paragraph 469 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 469.

470. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 470 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 470 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 470.

471. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 471 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response

is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 471, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 471.

472. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 472 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 472.

xi. Houston, Texas

473. Paragraph 473 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 473, and on that basis denies the allegation. To the extent that the allegations in Paragraph 473 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 473.

474. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 474, Footnote 233, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 474, and on that basis denies the allegation. To the extent that the allegations in Paragraph 474, Footnote 233, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 474, Footnote 233, or the accompanying map relate to other Defendants and/or third parties to this

action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 474, Footnote 233, and the accompanying map.

475. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 475 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 475, and on that basis denies the allegations. To the extent that the allegations in Paragraph 475 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 475.

476. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 476 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 476 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 476.

477. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 477 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 477, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 477.

478. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 478 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 478.

xii. Jacksonville, Florida

479. Paragraph 479 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 479, and on that basis denies the allegation. To the extent that the allegations in Paragraph 479 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 479.

480. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 480, Footnote 234, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 480, and on that basis denies the allegation. To the extent that the allegations in Paragraph 480, Footnote 234, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 480, Footnote 234, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 480, Footnote 234, and the accompanying map.

481. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 481 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 481, and on that basis denies the allegations. To the extent that the allegations in Paragraph 481 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 481.

482. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 482 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 482 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 482.

483. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 483 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 483, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 483.

484. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 484 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 484.

xiii. Las Vegas, Nevada

485. Paragraph 485 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 485, and on that basis denies the allegation. To the extent that the allegations in Paragraph 485 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 485.

486. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 486, Footnote 235, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 486, and on that basis denies the allegation. To the extent that the allegations in Paragraph 486, Footnote 235, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 486, Footnote 235, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 486, Footnote 235, and the accompanying map.

487. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 487 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of

Paragraph 487, and on that basis denies the allegations. To the extent that the allegations in Paragraph 487 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 487.

488. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 488 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 488 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 488.

489. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 489 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 489, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 489.

490. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 490 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 490.

xiv. Los Angeles, California

491. Paragraph 491 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 491, and on that basis denies the allegation. To the extent that the allegations in

Paragraph 491 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 491.

492. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 492, Footnote 236, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 492, and on that basis denies the allegation. To the extent that the allegations in Paragraph 492, Footnote 236, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 492, Footnote 236, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 492, Footnote 236, and the accompanying map.

493. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 493 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 493, and on that basis denies the allegations. To the extent that the allegations in Paragraph 493 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 493.

494. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 494 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 494 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 494.

495. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 495 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 495, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 495.

496. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 496 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 496.

497. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 497 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the information set forth in Paragraph 497, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 497.

xv. Memphis, Tennessee

498. Paragraph 498 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence

of Paragraph 498, and on that basis denies the allegation. To the extent that the allegations in Paragraph 498 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 498.

499. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 499 and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 499, and on that basis denies the allegation. To the extent that the allegations in Paragraph 499 or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 499 or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 499 and the accompanying map.

500. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 500 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 500, and on that basis denies the allegations. To the extent that the allegations in Paragraph 500 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 500.

501. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 501 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 501 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 501.

502. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 502 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 502, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 502.

503. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 503 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 503.

xvi. Miami, Florida

504. Paragraph 504 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 504, and on that basis denies the allegation. To the extent that the allegations in Paragraph 504 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 504.

505. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 505, Footnote 237, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 505, and on that basis denies the allegation. To the extent that the allegations in Paragraph 505, Footnote 237, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 505, Footnote 237, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 505, Footnote 237, and the accompanying map.

506. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 506 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 506, and on that basis denies the allegations. To the extent that the allegations in Paragraph 506 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 506.

507. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 507 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 507 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. To the extent that the allegations in Paragraph 507 purport to relate to CH Real Estate, CH Real Estate admits only that it owned and/or managed a multifamily residential property in Miami during the alleged Class Period and that the multifamily residential property CH Real Estate owned and/or managed in Miami during the alleged Class Period used RealPage's RMS for at least part of the alleged Class Period, but denies any characterization of CH Real Estate's use of RealPage's RMS. CH Real Estate denies the remaining allegations in Paragraph 507.

508. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 508 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 508, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 508.

509. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 509 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 509.

xvii. Milwaukee, Wisconsin

510. Paragraph 510 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 510, and on that basis denies the allegation. To the extent that the allegations in Paragraph 510 characterize or describe documents or other sources, such sources speak for

themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 510.

511. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 511, Footnote 238, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 511, and on that basis denies the allegation. To the extent that the allegations in Paragraph 511, Footnote 238, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 511, Footnote 238, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 511, Footnote 238, and the accompanying map.

512. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 512 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 512, and on that basis denies the allegations. To the extent that the allegations in Paragraph 512 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 512.

513. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 513 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 513 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 513.

514. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 514 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 514, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 514.

515. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 515 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 515.

xviii. Minneapolis, Minnesota

516. Paragraph 516 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 516, and on that basis denies the allegation. To the extent that the allegations in Paragraph 516 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 516.

517. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 517, Footnote 239, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 517, and on that basis denies the allegation. To the extent that the allegations in Paragraph 517, Footnote 239, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 517, Footnote 239, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 517, Footnote 239, and the accompanying map.

518. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 518 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 518, and on that basis denies the allegations. To the extent that the allegations in Paragraph 518 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 518.

519. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 519 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 519 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 519.

520. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 520 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 520, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 520.

521. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 521 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 521.

xix. New York, New York

522. Paragraph 522 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 522, and on that basis denies the allegation. To the extent that the allegations in Paragraph 522 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 522.

523. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 523, Footnote 240, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map

set forth in Paragraph 523, and on that basis denies the allegation. To the extent that the allegations in Paragraph 523, Footnote 240, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 523, Footnote 240, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 523, Footnote 240, and the accompanying map.

524. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 524 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 524, and on that basis denies the allegations. To the extent that the allegations in Paragraph 524 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 524.

525. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 525 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 525 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 525.

526. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 526 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 526, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 526.

527. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 527 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 527.

528. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 528 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the information set forth in Paragraph 528, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 528.

xx. Orlando, Florida

529. Paragraph 529 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 529, and on that basis denies the allegation. To the extent that the allegations in Paragraph 529 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 529.

530. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 530, Footnote 241, and the accompanying map contain Plaintiffs' characterization of their claims and/or

legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 530, and on that basis denies the allegation. To the extent that the allegations in Paragraph 530, Footnote 241, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 530, Footnote 241, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 530, Footnote 241, and the accompanying map.

531. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 531 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 531, and on that basis denies the allegations. To the extent that the allegations in Paragraph 531 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 531.

532. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 532 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 532 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. To the

extent that the allegations in Paragraph 532 purport to relate to CH Real Estate, CH Real Estate admits only that it owned and/or managed multifamily residential properties in Orlando during the alleged Class Period and that certain multifamily residential properties CH Real Estate owned and/or managed in Orlando during the alleged Class Period used RealPage's RMS for at least part of the alleged Class Period, but denies any characterization of CH Real Estate's use of RealPage's RMS. CH Real Estate denies the remaining allegations in Paragraph 532.

533. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 533 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 533, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 533.

534. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 534 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 534.

xxi. Philadelphia, Pennsylvania

535. Paragraph 535 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 535, and on that basis denies the allegation. To the extent that the allegations in Paragraph 535 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 535.

536. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 536, Footnote 242, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 536, and on that basis denies the allegation. To the extent that the allegations in Paragraph 536, Footnote 242, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 536, Footnote 242, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 536, Footnote 242, and the accompanying map.

537. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 537 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 537, and on that basis denies the allegations. To the extent that the allegations in Paragraph 537 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 537.

538. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 538 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 538 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 538.

539. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 539 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in the first sentence of Paragraph 539, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 539.

xxii. Phoenix, Arizona

540. Paragraph 540 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 540, and on that basis denies the allegation. To the extent that the allegations in Paragraph 540 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 540.

541. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 541 and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 541, and on that basis denies the allegation. To the extent that the allegations in Paragraph 541 or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that

is inconsistent therewith. To the extent that the allegations in Paragraph 541 or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 541 and the accompanying map.

542. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 542 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 542, and on that basis denies the allegations. To the extent that the allegations in Paragraph 542 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 542.

543. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 543 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 543 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 543.

544. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 544 and Footnote 243 contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 544, and

on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 544 and Footnote 243.

545. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 545 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 545.

546. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 546 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the information set forth in Paragraph 546, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 546.

xxiii. Pittsburgh, Pennsylvania

547. Paragraph 547 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 547, and on that basis denies the allegation. To the extent that the allegations in Paragraph 547 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 547.

548. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 548, Footnote 244, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 548, and on that basis denies the allegation. To the extent that the allegations

in Paragraph 548, Footnote 244, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 548, Footnote 244, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 548, Footnote 244, and the accompanying map.

549. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 549 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 549, and on that basis denies the allegations. To the extent that the allegations in Paragraph 549 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 549.

550. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 550 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 550 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 550.

551. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 551 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response

is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 551, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 551.

552. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 552 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 552.

xxiv. Portland, Oregon

553. Paragraph 553 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 553, and on that basis denies the allegation. To the extent that the allegations in Paragraph 553 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 553.

554. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 554, Footnote 245, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 554, and on that basis denies the allegation. To the extent that the allegations in Paragraph 554, Footnote 245, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 554, Footnote 245, or the accompanying map relate to other Defendants and/or third parties to this

action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 554, Footnote 245, and the accompanying map.

555. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 555 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 555, and on that basis denies the allegations. To the extent that the allegations in Paragraph 555 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 555.

556. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 556 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 556 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 556.

557. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 557 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 557, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 557.

558. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 558 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 558.

559. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 559 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the information set forth in Paragraph 559, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 559.

xxv. San Diego, California

560. Paragraph 560 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 560, and on that basis denies the allegation. To the extent that the allegations in Paragraph 560 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 560.

561. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 561, Footnote 246, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 561, and on that basis denies the allegation. To the extent that the allegations in Paragraph 561, Footnote 246, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization

or description that is inconsistent therewith. To the extent that the allegations in Paragraph 561, Footnote 246, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 561, Footnote 246, and the accompanying map.

562. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 562 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 562, and on that basis denies the allegations. To the extent that the allegations in Paragraph 562 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 562.

563. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 563 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 563 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 563.

564. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 564 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to

form a belief as to the accuracy of the precise figure set forth in Paragraph 564, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 564.

565. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 565 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 565.

566. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 566 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the information set forth in Paragraph 566, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 566.

xxvi. San Francisco, California

567. Paragraph 567 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 567, and on that basis denies the allegation. To the extent that the allegations in Paragraph 567 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 567.

568. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 568, Footnote 247, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 568, and on that basis denies the allegation. To the extent that the allegations

in Paragraph 568, Footnote 247, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 568, Footnote 247, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 568, Footnote 247, and the accompanying map.

569. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 569 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 569, and on that basis denies the allegations. To the extent that the allegations in Paragraph 569 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 569.

570. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 570 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 570 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 570.

571. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 571 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response

is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 571, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 571.

572. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 572 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 572.

573. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 573 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the information set forth in Paragraph 573 and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 573.

xxvii. San Jose, California

574. Paragraph 574 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 574, and on that basis denies the allegation. To the extent that the allegations in Paragraph 574 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 574.

575. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 575, Footnote 248, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map

set forth in Paragraph 575, and on that basis denies the allegation. To the extent that the allegations in Paragraph 575, Footnote 248, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 575, Footnote 248, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 575, Footnote 248, and the accompanying map.

576. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 576 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 576, and on that basis denies the allegations. To the extent that the allegations in Paragraph 576 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 576.

577. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 577 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 577 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 577.

578. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 578 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 578, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 578.

579. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 579 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 579.

580. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 580 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the information set forth in Paragraph 580, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 580.

xxviii. Seattle, Washington

581. Paragraph 581 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 581, and on that basis denies the allegation. To the extent that the allegations in Paragraph 581 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 581.

582. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 582, Footnote 249, and the accompanying map contain Plaintiffs' characterization of their claims and/or

legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 582, and on that basis denies the allegation. To the extent that the allegations in Paragraph 582, Footnote 249, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 582, Footnote 249, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 582, Footnote 249, and the accompanying map.

583. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 583 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 583, and on that basis denies the allegations. To the extent that the allegations in Paragraph 583 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 583.

584. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 584 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 584 that relate to other

Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 584.

585. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 585 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 585, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 585.

586. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 586 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 586.

587. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 587 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the information set forth in Paragraph 587, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 587.

xxix. St. Louis, Missouri

588. Paragraph 588 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 588, and on that basis denies the allegation. To the extent that the allegations in Paragraph 588 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 588.

589. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 589, Footnote 250, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 589, and on that basis denies the allegation. To the extent that the allegations in Paragraph 589, Footnote 250, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 589, Footnote 250, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 589, Footnote 250, and the accompanying map.

590. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 590 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 590, and on that basis denies the allegations. To the extent that the allegations in Paragraph 590 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 590.

591. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 591 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 591 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. To the extent that the allegations in Paragraph 591 purport to relate to CH Real Estate, CH Real Estate admits only that it owned and/or managed a multifamily residential property in St. Louis during the alleged Class Period and that the multifamily residential property CH Real Estate owned and/or managed in St. Louis during the alleged Class Period used RealPage's RMS for at least part of the alleged Class Period, but denies any characterization of CH Real Estate's use of RealPage's RMS. CH Real Estate denies the remaining allegations in Paragraph 591.

592. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 592 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 592, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 592.

593. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 593 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 593.

xxx. Tampa, Florida

594. Paragraph 594 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 594, and on that basis denies the allegation. To the extent that the allegations in Paragraph 594 characterize or describe documents or other sources, such sources speak for

themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 594.

595. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 595, Footnote 251, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 595, and on that basis denies the allegation. To the extent that the allegations in Paragraph 595, Footnote 251, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 595, Footnote 251, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 595, Footnote 251, and the accompanying map.

596. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 596 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 596, and on that basis denies the allegations. To the extent that the allegations in Paragraph 596 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 596.

597. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 597 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 597 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. To the extent that the allegations in Paragraph 597 purport to relate to CH Real Estate, CH Real Estate admits only that it owned and/or managed multifamily residential properties in Tampa during the alleged Class Period and that certain multifamily residential properties CH Real Estate owned and/or managed in Tampa during the alleged Class Period used RealPage's RMS for at least part of the alleged Class Period, but denies any characterization of CH Real Estate's use of RealPage's RMS. CH Real Estate denies the remaining allegations in Paragraph 597.

598. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 598 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 598, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 598.

599. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 599 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 599.

xxxi. Tucson, Arizona

600. Paragraph 600 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence

of Paragraph 600, and on that basis denies the allegation. To the extent that the allegations in Paragraph 600 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 600.

601. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 601, Footnote 252, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 601, and on that basis denies the allegation. To the extent that the allegations in Paragraph 601, Footnote 252, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 601, Footnote 252, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 601, Footnote 252, and the accompanying map.

602. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 602 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 602, and on that basis denies the allegations. To the extent that the allegations in Paragraph 602 characterize or describe documents or other sources, such sources speak for

themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 602.

603. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 603 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 603 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 603.

604. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 604 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 604, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 604.

605. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 605 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 605.

xxxii. Washington, District of Columbia

606. Paragraph 606 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence of Paragraph 606, and on that basis denies the allegation. To the extent that the allegations in Paragraph 606 characterize or describe documents or other sources, such sources speak for

themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 606.

607. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 607, Footnote 253, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 607, and on that basis denies the allegation. To the extent that the allegations in Paragraph 607, Footnote 253, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 607, Footnote 253, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 607, Footnote 253, and the accompanying map.

608. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 608 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 608, and on that basis denies the allegations. To the extent that the allegations in Paragraph 608 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 608.

609. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 609 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 609 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 609.

610. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 610 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 610, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 610.

611. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 611 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 611.

612. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 612 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the information set forth in Paragraph 612, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 612.

xxxiii. Wilmington, North Carolina

613. Paragraph 613 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the precise figure set forth in the second sentence

of Paragraph 613, and on that basis denies the allegation. To the extent that the allegations in Paragraph 613 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 613.

614. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 614, Footnote 254, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 614, and on that basis denies the allegation. To the extent that the allegations in Paragraph 614, Footnote 254, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 614, Footnote 254, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 614, Footnote 254, and the accompanying map.

615. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 615 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figures set forth in the first and second sentences of Paragraph 615, and on that basis denies the allegations. To the extent that the allegations in Paragraph 615 characterize or describe documents or other sources, such sources speak for

themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. CH Real Estate denies the remaining allegations in Paragraph 615.

616. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 616 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 616 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 616.

617. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 617 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 617, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 617.

618. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 618 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 618.

619. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 619 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the information set forth in the second sentence of Paragraph 619, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 619.

xxxiv. Birmingham-Hoover, AL MSA

620. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 620, Footnote 255, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 620, and on that basis denies the allegation. To the extent that the allegations in Paragraph 620, Footnote 255, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 620, Footnote 255, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 620, Footnote 255, and the accompanying map.

621. Paragraph 621 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 621.

622. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 622 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 622 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. To the extent that the allegations in Paragraph 622 purport to relate to CH Real Estate, CH Real Estate admits only that it owned and/or managed a multifamily residential property in Birmingham during the alleged Class Period and that the multifamily residential property CH Real Estate owned and/or

managed in Birmingham during the alleged Class Period used RealPage's RMS for at least part of the alleged Class Period, but denies any characterization of CH Real Estate's use of RealPage's RMS. CH Real Estate denies the remaining allegations in Paragraph 622.

623. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 623 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 623, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 623.

624. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 624 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 624.

xxxv. Buffalo, New York

625. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 625, Footnote 256, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 625, and on that basis denies the allegation. To the extent that the allegations in Paragraph 625, Footnote 256, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 625, Footnote 256, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth

and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 625, Footnote 256, and the accompanying map.

626. Paragraph 626 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 626.

627. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 627 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 627 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 627.

628. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 628 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 628, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 628.

629. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 629 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 629.

xxxvi. Cincinnati, Ohio

630. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 630, Footnote 257, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real

Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 630, and on that basis denies the allegation. To the extent that the allegations in Paragraph 630, Footnote 257, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 630, Footnote 257, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 630, Footnote 257, and the accompanying map.

631. Paragraph 631 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 631.

632. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 632 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 632 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 632.

633. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 633 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 633, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 633.

634. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 634 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 634.

xxxvii. Cleveland, Ohio

635. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 635, Footnote 258, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 635, and on that basis denies the allegation. To the extent that the allegations in Paragraph 635, Footnote 258, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 635, Footnote 258, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 635, Footnote 258, and the accompanying map.

636. Paragraph 636 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 636.

637. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 637 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 637 that relate to other

Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 637.

638. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 638 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 638, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 638.

639. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 639 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 639.

xxxviii. Columbus, Ohio

640. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 640, Footnote 259, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 640, and on that basis denies the allegation. To the extent that the allegations in Paragraph 640, Footnote 259, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 640, Footnote 259, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 640, Footnote 259, and the accompanying map.

641. Paragraph 641 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 641.

642. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 642 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 642 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 642.

643. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 643 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 643, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 643.

644. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 644 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 644.

xxxix. Hartford, Connecticut

645. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 645, Footnote 260, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 645, and on that basis denies the allegation. To the extent that the allegations

in Paragraph 645, Footnote 260, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 645, Footnote 260, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 645, Footnote 260, and the accompanying map.

646. Paragraph 646 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 646.

647. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 647 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 647 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 647.

648. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 648 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 648, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 648.

649. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 649 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response

is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 649.

xl. Riverside, California

650. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 650, Footnote 261, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 650, and on that basis denies the allegation. To the extent that the allegations in Paragraph 650, Footnote 261, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 650, Footnote 261, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 650, Footnote 261, and the accompanying map.

651. Paragraph 651 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 651.

652. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 652 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 652 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 652.

653. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 653 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 653, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 653.

654. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 654 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 654.

xli. Sacramento, California

655. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 655, Footnote 262, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 655, and on that basis denies the allegation. To the extent that the allegations in Paragraph 655, Footnote 262, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 655, Footnote 262, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 655, Footnote 262, and the accompanying map.

656. Paragraph 656 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 656.

657. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 657 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 657 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 657.

658. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 658 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 658, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 658.

659. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 659 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 659.

xlii. Salt Lake City, Utah

660. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 660, Footnote 263, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 660, and on that basis denies the allegation. To the extent that the allegations

in Paragraph 660, Footnote 263, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 660, Footnote 263, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 660, Footnote 263, and the accompanying map.

661. Paragraph 661 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 661.

662. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 662 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 662 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 662.

663. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 663 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 663, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 663.

664. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 664 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response

is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 664.

xlili. San Antonio, Texas

665. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 665, Footnote 264, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 665, and on that basis denies the allegation. To the extent that the allegations in Paragraph 665, Footnote 264 or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 665, Footnote 264, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 665, Footnote 264, and the accompanying map.

666. Paragraph 666 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 666.

667. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 667 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 667 that relate to other Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 667.

668. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 668 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 668, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 668.

669. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 669 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 669.

xliv. San Juan, Puerto Rico

670. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 670 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, and to the extent that the allegations in Paragraph 670 characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 670 relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 670.

671. Paragraph 671 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 671.

672. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 672 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response

is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 672, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 672.

xlv. Virginia Beach, Virginia

673. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 673, Footnote 265, and the accompanying map contain Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the accompanying map set forth in Paragraph 673, and on that basis denies the allegation. To the extent that the allegations in Paragraph 673, Footnote 265, or the accompanying map characterize or describe documents or other sources, such sources speak for themselves, and CH Real Estate denies any characterization or description that is inconsistent therewith. To the extent that the allegations in Paragraph 673, Footnote 265, or the accompanying map relate to other Defendants and/or third parties to this action, CH Real Estate lacks knowledge or information sufficient to form a belief as to their truth and on this basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 673, Footnote 265, and the accompanying map.

674. Paragraph 674 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 674.

675. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 675 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 675 that relate to other

Defendants and/or third parties to this action, and on that basis denies these allegations. CH Real Estate denies the remaining allegations in Paragraph 675.

676. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 676 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate lacks information sufficient to form a belief as to the accuracy of the precise figure set forth in Paragraph 676, and on that basis denies the allegation. CH Real Estate denies the remaining allegations in Paragraph 676.

677. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 677 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 677.

678. Paragraph 678 contains Plaintiffs' characterization of their of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 678.

679. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 679 contains Plaintiffs' characterization of their of their claims, allegations subject to proof by expert testimony, and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 679.

680. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 680 contains Plaintiffs' characterization of their of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 680.

VII. CLASS ACTION ALLEGATIONS

681. Paragraph 681 contains Plaintiffs' characterization of their claims and/or legal conclusions to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring this action as a class action, but CH Real Estate denies that this action can be properly maintained as a class action whether on behalf of the purported class or otherwise, and denies the allegations in Paragraph 681.

682. Paragraph 682 contains Plaintiffs' characterization of their claims and/or legal conclusions to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to exclude persons and entities identified in Paragraph 682 from their purported class, but CH Real Estate denies that this action can be properly maintained as a class action whether on behalf of the purported class or otherwise, and denies the allegations in Paragraph 682.

683. Paragraph 683 contains Plaintiffs' characterization of their claims and/or legal conclusions to which no response is required. To the extent a response is required, CH Real Estate denies that this action can be properly maintained as a class action whether on behalf of the purported class or otherwise, and denies the allegations in Paragraph 683.

684. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 684 contains Plaintiffs' characterization of their claims and/or legal conclusions to which no response is required. To the extent a response is required, CH Real Estate denies that this action can be properly maintained as a class action whether on behalf of the purported class or otherwise, and denies the allegations in Paragraph 684.

685. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 685 contains Plaintiffs' characterization of their claims and/or legal conclusions to which no response is required. To the extent a response is required, CH Real Estate denies that this action can be

properly maintained as a class action whether on behalf of the purported class or otherwise, and denies the allegations in Paragraph 685.

686. Paragraph 686 contains Plaintiffs' characterization of their claims and/or legal conclusions to which no response is required. To the extent a response is required, CH Real Estate denies that this action can be properly maintained as a class action whether on behalf of the purported class or otherwise. CH Real Estate otherwise lacks knowledge or information sufficient to form a belief as to the truth of the allegation in Paragraph 686 and on this basis denies these allegations.

687. Paragraph 687 contains Plaintiffs' characterization of their claims and/or legal conclusions to which no response is required. To the extent a response is required, CH Real Estate denies that this action can be properly maintained as a class action whether on behalf of the purported class or otherwise. CH Real Estate otherwise lacks knowledge or information sufficient to form a belief as to the truth of the allegation in Paragraph 687 and on this basis denies these allegations.

688. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 688 contains Plaintiffs' characterization of their claims and/or legal conclusions to which no response is required. To the extent a response is required, CH Real Estate denies that this action can be properly maintained as a class action whether on behalf of the purported class or otherwise, and denies the allegations in Paragraph 688.

689. Paragraph 689 contains Plaintiffs' characterization of their claims and/or legal conclusions to which no response is required. To the extent a response is required, CH Real Estate denies that this action can be properly maintained as a class action whether on behalf of the purported class or otherwise, and denies the allegations in Paragraph 689.

690. Paragraph 690 contains Plaintiffs' characterization of their claims and/or legal conclusions to which no response is required. To the extent a response is required, CH Real Estate denies that this action can be properly maintained as a class action whether on behalf of the purported class or otherwise. CH Real Estate otherwise lacks knowledge or information sufficient to form a belief as to the truth of the allegation in Paragraph 690 and on this basis denies these allegations.

VIII. ANTITRUST INJURY

691. CH Real Estate denies the allegations in Paragraph 691.

692. CH Real Estate denies the allegations in Paragraph 692.

693. CH Real Estate denies the allegations in Paragraph 693.

IX. CONTINUING VIOLATION

694. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 694 and Footnote 266 contain Plaintiffs' characterization of their claims and/or legal conclusions to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 694 and Footnote 266.

695. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 695 contain Plaintiffs' characterization of their claims and/or legal conclusions to which no response is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 695.

696. CH Real Estate denies the allegations in Paragraph 696.

697. CH Real Estate denies the allegations in Paragraph 697.

698. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 698 contain Plaintiffs' characterization of their claims and/or legal conclusions to which no response

is required. To the extent a response is required, CH Real Estate denies the allegations in Paragraph 698.

699. CH Real Estate denies the allegations in Paragraph 699.

700. CH Real Estate denies the allegations in Paragraph 700.

X. CLAIMS FOR RELIEF

COUNT I Price Fixing in Violation of Section 1 of the Sherman Act (15 U.S.C. § 1)

701. CH Real Estate incorporates by reference its answer to each preceding and succeeding paragraph, as if fully set forth herein in response to Paragraph 701.

702. CH Real Estate denies the allegations in Paragraph 702.

703. CH Real Estate denies the allegations in Paragraph 703.

704. CH Real Estate denies the allegations in Paragraph 704.

705. CH Real Estate denies the allegations in Paragraph 705.

706. CH Real Estate denies the allegations in Paragraph 706.

707. CH Real Estate denies the allegations in Paragraph 707.

COUNT II Violation of State Antitrust Statutes (On behalf of Plaintiffs and the Class)

708. CH Real Estate incorporates by reference its answer to each preceding and succeeding paragraph, as if fully set forth herein in response to Paragraph 708.

709. CH Real Estate denies the allegations in Paragraph 709.

710. CH Real Estate denies the allegations in Paragraph 710.

711. CH Real Estate denies the allegations in Paragraph 711.

712. CH Real Estate denies the allegations in Paragraph 712.

713. CH Real Estate denies the allegations in Paragraph 713.

714. CH Real Estate denies the allegations in Paragraph 714.

715. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 715 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under ALA. CODE § 6-5-60, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under ALA. CODE § 6-5-60, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 715.

716. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 716 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under ALASKA STAT. § 45.50.562, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under ALASKA STAT. § 45.50.562, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 716.

717. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 717 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under ARIZ. REV. STAT. § 44-1401, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under ARIZ. REV. STAT. § 44-1401, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 717.

718. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 718 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response

is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under CAL. BUS. & PROF. CODE § 16700, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under CAL. BUS. & PROF. CODE § 16700, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 718.

719. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 719 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under D.C. CODE § 28-4501, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under D.C. CODE § 28-4501, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 719.

720. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 720 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under FL. STAT. § 542.15, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under FL. STAT. § 542.15, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 720.

721. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 721 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under GA. CODE § 13-8-2.1, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under GA. CODE § 13-8-2.1, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 721.

722. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 722 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under Haw. Rev. Stat. Ann. § 480-1, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under Haw. Rev. Stat. Ann. § 480-1, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 722.

723. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 723 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under IDAHO CODE § 48-101, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under IDAHO CODE § 48-101, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 723.

724. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 724 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under Section 740 ILCS 10/1, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under Section 740 ILCS 10/1, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 724.

725. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 725 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under IND. CODE §§ 24-1-2-1, *et seq.* and IND. CODE §§ 24-1-3-1, *et seq.* and

purport to seek certain relief, but denies that Plaintiffs state a claim under IND. CODE §§ 24-1-2-1, *et seq.* and IND. CODE §§ 24-1-3-1, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 725.

726. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 726 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under IOWA CODE § 553.1, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under IOWA CODE § 553.1, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 726.

727. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 727 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under KAN. STAT. § 50-101, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under KAN. STAT. § 50-101, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 727.

728. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 728 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under LA. STAT. § 51:121, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under LA. STAT. § 51:121, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 728.

729. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 729 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response

is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under ME. REV. STAT. ANN. tit. 10, § 1101 and purport to seek certain relief, but denies that Plaintiffs state a claim under ME. REV. STAT. ANN. tit. 10, § 1101 and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 729.

730. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 730 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under MD. CODE ANN., COM. LAW § 11-201, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under MD. CODE ANN., COM. LAW § 11-201, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 730.

731. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 731 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under MASS. GEN. LAWS ch. 93A, § 1, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under MASS. GEN. LAWS ch. 93A, § 1, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 731.

732. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 732 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under MICH. COMP. LAWS § 445.771, *et seq.* and purport to seek certain relief,

but denies that Plaintiffs state a claim under MICH. COMP. LAWS § 445.771, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 732.

733. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 733 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under MINN. STAT. § 325D.49, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under MINN. STAT. § 325D.49, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 733.

734. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 734 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under MISS. CODE § 75-21-1, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under MISS. CODE § 75-21-1, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 734.

735. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 735 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under MO. REV. STAT. § 416.011, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under MO. REV. STAT. § 416.011, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 735.

736. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 736 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under MONT. CODE ANN. § 30-14-201, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under MONT. CODE ANN. § 30-14-201, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 736.

737. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 737 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under NEB. REV. STAT. § 59-801, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under NEB. REV. STAT. § 59-801, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 737.

738. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 738 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under N.H. REV. STAT. ANN. § 356:1, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under N.H. REV. STAT. ANN. § 356:1, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 738.

739. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 739 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response

is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under N.J. REV. STAT. § 56:9-1, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under N.J. REV. STAT. § 56:9-1, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 739.

740. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 740 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under N.M. STAT. ANN. § 57-1-1, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under N.M. STAT. ANN. § 57-1-1, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 740.

741. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 741 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under N.Y. GEN. BUS. LAW § 340, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under N.Y. GEN. BUS. LAW § 340, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 741.

742. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 742 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under N.C. GEN. STAT. § 75-1, *et seq.* and purport to seek certain relief, but denies

that Plaintiffs state a claim under N.C. GEN. STAT. § 75-1, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 742.

743. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 743 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under N.D. CENT. CODE § 51-08.1-01, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under N.D. CENT. CODE § 51-08.1-01, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 743.

744. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 744 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under OHIO REV. CODE § 1331:01, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under OHIO REV. CODE § 1331:01, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 744.

745. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 745 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under OKLA. STAT. tit. 79 § 201, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under OKLA. STAT. tit. 79 § 201, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 745.

746. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 746 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under OR. REV. STAT. § 646.725, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under OR. REV. STAT. § 646.725, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 746.

747. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 747 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under the Pennsylvania Unfair Trade Practices and Consumer Protection Law, 73 PA. CONS. STAT. § 201-1, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under Pennsylvania Unfair Trade Practices and Consumer Protection Law, 73 PA. CONS. STAT. § 201-1, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 747.

748. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 748 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under S.C. CODE ANN. § 39-3-10, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under S.C. CODE ANN. § 39-3-10, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 748.

749. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 749 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under S.D. CODIFIED LAWS § 37-1-3.1, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under S.D. CODIFIED LAWS § 37-1-3.1, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 749.

750. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 750 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under TENN. CODE ANN. § 47-25-101, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under TENN. CODE ANN. § 47-25-101, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 750.

751. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 751 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under UTAH CODE ANN. § 76-10-3101, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under UTAH CODE ANN. § 76-10-3101, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 751.

752. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 752 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response

is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under VT. STAT. ANN. tit 9, § 2453, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under VT. STAT. ANN. tit 9, § 2453, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 752.

753. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 753 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under VA. CODE ANN. § 59.1-9.1, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under VA. CODE ANN. § 59.1-9.1, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 753.

754. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 754 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under WASH. REV. CODE ANN. § 19.86.010, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under WASH. REV. CODE ANN. § 19.86.010, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 754.

755. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 755 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under W. VA. CODE § 47-18-3, *et seq.* and purport to seek certain relief, but denies

that Plaintiffs state a claim under W. VA. CODE § 47-18-3, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 755.

756. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 756 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under WIS. STAT. §133.01, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under WIS. STAT. §133.01, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 756.

757. CH Real Estate denies the conspiracy alleged in the Complaint. Paragraph 757 contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate admits that Plaintiffs purport to bring a claim under WY. STAT. ANN. § 0-4-101, *et seq.* and purport to seek certain relief, but denies that Plaintiffs state a claim under WY. STAT. ANN. § 0-4-101, *et seq.* and/or that Plaintiffs are entitled to any of the relief sought. CH Real Estate denies the remaining allegations in Paragraph 757.

XI. PRAYER FOR RELIEF

Plaintiffs' unnumbered Prayer for Relief does not contain any factual assertions to which a response is required. Plaintiffs' Prayer for Relief further contains Plaintiffs' characterization of their claims and/or legal conclusions, to which no response is required. To the extent a response is required, CH Real Estate denies that Plaintiffs are entitled to any of the relief requested in their Prayer for Relief.

JURY TRIAL DEMANDED

Plaintiffs' unnumbered Jury Trial Demand does not contain any factual assertions to which a response is required. To the extent a response is required, CH Real Estate denies that Plaintiffs

are entitled to a trial by jury to the extent a contractual agreement to arbitrate, to waive a jury trial, or to waive a class action entered into by Plaintiffs or any purported class member precludes such trial by jury.

ADDITIONAL ALLEGATIONS AND GENERAL DENIAL

CH Real Estate denies all allegations in the Complaint unless CH Real Estate has expressly admitted the allegations herein. Where an allegation in the Complaint is directed at another Defendant or a party unaffiliated with CH Real Estate, except as otherwise expressly stated, CH Real Estate denies the allegations set forth in the Complaint on the basis that it lacks the knowledge or information sufficient to form a belief concerning the truth of such allegations. Further, unless otherwise expressly admitted, CH Real Estate denies any allegations in the headings, footnotes or other places in the Complaint, to the extent that any such allegations require a response. Any headings, subheadings or similar text that CH Real Estate has included in this Answer are for the convenience of the Court and the parties, and are not intended to be nor shall they be construed as an admission of any fact by CH Real Estate.

AFFIRMATIVE DEFENSES

Without assuming any burden that it otherwise would not bear, and reserving the right to assert additional defenses as those defenses become known during discovery, CH Real Estate asserts the following separate and additional defenses. CH Real Estate reserves all affirmative defenses under Federal Rule of Civil Procedure 8(c) and any other defenses at law or equity that may exist now or in the future. CH Real Estate reserves the right to assert other defenses as this action proceeds up to and including the time of trial.

FIRST DEFENSE

(Failure To State A Claim)

1. Plaintiffs' claims are barred in whole or in part because Plaintiffs' Second Amended Consolidated Class Action Complaint fails to state facts upon which relief can be granted.

SECOND DEFENSE

(Statute of Limitations)

2. Plaintiffs' claims are barred, in whole or in part, by the applicable statute of limitations.

3. To the extent Plaintiffs seek to bring claims outside the applicable statute of limitations, Plaintiffs' Complaint is time-barred.

4. To the extent that Plaintiffs' Complaint relies on information made public more than four years ago, Plaintiff's Complaint is time-barred.

THIRD DEFENSE

(No injury)

5. Plaintiffs' claims are barred, in whole or in part, because Plaintiffs have not suffered any injury in fact or any injury cognizable under the antitrust laws.

6. While Plaintiffs purport to allege that a conspiracy resulted in their alleged harm, in essence, Plaintiffs actually complain about the impact of naturally unpredictable changes in the market conditions that exist in the global, national, and local economy.

7. To the extent that Plaintiffs maintain that they were injured by these events, such an injury is not cognizable under the antitrust laws.

FOURTH DEFENSE

(Failure To Mitigate)

8. Plaintiffs' claims are barred, in whole or in part, because Plaintiffs failed to exercise reasonable care to mitigate any damages they may have suffered.

9. To the extent Plaintiffs believed that CH Real Estate agreed to use RealPage Revenue Management software and that such agreement had the effect of raising rental prices above competitive levels, Plaintiffs had an obligation to mitigate their damages by seeking other sources of supply, including from other property managers or owners. Plaintiffs' failure to exercise reasonable care to mitigate damages was the complete or partial cause of any damages Plaintiffs may have suffered.

FIFTH DEFENSE

(Lack of Proximate Cause & Intervening/Superseding Conduct)

10. Plaintiffs' claims are barred, in whole or in part, because any alleged injuries and damages either were not legally or proximately caused by any acts or omissions of CH Real Estate or were caused, if at all, solely and proximately by Plaintiffs' conduct or by the conduct of third parties including, without limitation, the prior, intervening, or superseding conduct of Plaintiffs or such third parties.

SIXTH DEFENSE

(Waiver)

11. Plaintiffs' claims are barred, in whole or in part, by the doctrine of waiver.

12. Plaintiffs' continued rental leases at what they now allege are prices above the competitive level manifest an intention to waive any right to bring this suit and are inconsistent with any other intention.

13. Plaintiffs, by their actions, accepted the benefits of an ongoing relationship with Defendants and relinquished their rights to bring suit.

SEVENTH DEFENSE

(Laches)

14. Plaintiffs' claims are barred by the equitable doctrine of laches.

15. Plaintiffs demonstrated an unreasonable lack of diligence in bringing their claims.

16. Plaintiffs' unreasonable lack of diligence in bringing their claims now bars them.

EIGHTH DEFENSE

(Consent)

17. Plaintiffs' claims are barred, in whole or in part, due to their ratification of, and consent to, the conduct of CH Real Estate.

18. Plaintiffs' Complaint demonstrates its long-standing ratification of and consent to the complained-of conduct.

19. Accordingly, because Plaintiffs have been aware for years of the very same conduct they now challenge—and because some of that conduct provided Plaintiffs a direct benefit—Plaintiffs' claims are barred by the doctrine of ratification.

NINTH DEFENSE

(Arbitration Agreements, Class Action Waivers, or Other Contractual Terms)

20. Plaintiffs' claims are barred, in whole or in part, to the extent the rental lease agreements pursuant to which Plaintiffs' rented their apartments contain arbitration clauses, clauses providing a different forum for the resolution of their claims, or provisions waiving a Plaintiff's ability to bring a representative or class action claim.

TENTH DEFENSE

(Right to Set Off Amounts Paid)

21. Without admitting the existence of any contract, combination, or conspiracy in restraint of trade, and expressly denying same, Plaintiffs' claims are barred, in whole or in part, by non-settling Defendants' right to set off any amounts paid to Plaintiffs by any Defendants who have settled, or do settle, Plaintiffs' claims against them in this action.

ELEVENTH DEFENSE

(Contracts Without Any Purported Overcharge)

22. Without admitting the existence of any contract, combination, or conspiracy in restraint of trade, and expressly denying same, Plaintiffs' claims are barred, in whole or in part, to the extent that Plaintiffs entered into contracts that do not include any purported overcharge.

TWELFTH DEFENSE

(Improper Damages)

23. Plaintiffs' claims are barred, in whole or in part, to the extent they seek improper multiple damage awards, and damage awards duplicative of those sought in other actions, in violation of the Due Process guarantees of the Fifth and Fourteenth Amendments of the United States Constitution and of the Eighth Amendment of the United States Constitution.

THIRTEENTH DEFENSE

(Acquiescence)

24. Plaintiffs' claims are barred, in whole or in part, by the Plaintiffs' knowing acquiescence to the restraints of trade alleged in the Complaint.

FOURTEENTH DEFENSE

(Lack of Jurisdiction)

25. Some or all of Plaintiffs' state-law claims cannot be brought against CH Real Estate for a lack of jurisdiction. For instance, the laws of the states cited in Count II of the Complaint are not intended to, and do not, apply to conduct occurring outside of those states, and Plaintiffs' Complaint does not include any Plaintiff from the States of Alaska, Arizona, District of Columbia, Hawaii, Idaho, Indiana, Iowa, Kansas, Louisiana, Maine, Maryland, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, South Carolina, South Dakota, Utah, Vermont, Virginia, West Virginia, Wisconsin, and Wyoming.

26. Many of the state laws allegedly giving rise to Plaintiffs' claims do not apply because the alleged conduct did not occur within or substantially affect the citizens or commerce of the respective states, or because CH Real Estate had no specific intent to impact the commerce of those states. As a result, the application of those state laws to CH Real Estate's conduct would violate the Due Process Clauses and Commerce Clause of the U.S. Constitution, the principle of federalism, and the constitutions and laws of the respective states at issue.

27. To the extent that the Complaint seeks to assert claims or obtain relief on behalf of multifamily renters located outside of the jurisdictions governed by those laws, those claims are barred as improper assertions of extraterritorial jurisdiction and any effort to enforce those laws as to residents of other states would violate the Due Process Clause and the Commerce Clause of the U.S. Constitution and various state laws and constitutions.

FIFTEENTH DEFENSE

(No Private Right of Action)

28. Some of Plaintiffs' state-law claims are barred, in whole or in part, to the extent Plaintiffs seek damages under state laws that do not permit recovery of damages by private plaintiffs.

SIXTEENTH DEFENSE

(Failure to Comply with State Law Notice)

29. Plaintiffs' claims are barred, in whole or in part, to the extent that Plaintiffs failed to comply with the notice requirements under various state laws.

SEVENTEENTH DEFENSE

(Justified & Pro-Competitive Conduct)

30. Some or all of Plaintiffs' claims are barred because all of CH Real Estate's conduct challenged by Plaintiffs was lawful, fair, non-deceptive, expressly authorized by law, justified, and pro-competitive; it constituted a bona fide business practice consistent with industry practices and was carried out in furtherance of legitimate business interests.

EIGHTEENTH DEFENSE

(Incorporating Other Defendants' Defenses)

31. CH Real Estate adopts and incorporates by reference any and all other defenses asserted by any other Defendant to the extent that the defense would apply to CH Real Estate.

NINETEENTH DEFENSE

(Right to Assert Other Defenses)

32. CH Real Estate reserves the right to assert other defenses as this action proceeds up to and including the time of trial.

PRAYER FOR RELIEF

WHEREFORE, CH Real Estate respectfully requests that judgment be entered in favor of CH Real Estate and the other Defendants and against Plaintiffs, dismissing the Complaint in its entirety with prejudice. CH Real Estate further requests that this Court (i) award CH Real Estate its costs and disbursements, and (ii) award such other and further relief as the Court deems just and proper.

Dated: February 5, 2024

Respectfully submitted,

/s/ Danielle R. Foley

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CERTIFICATE OF SERVICE

I hereby certify that on February 5, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record registered on the CM/ECF system.

DATED this 5th day of February 2024.

/s/ Danielle R. Foley